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December 24, 2024

Hon. Analisa N Torres, U.S.D.J.
500 Pearl St.
Daniel Patrick Moynihan United States Courthouse
New York, NY 10007-1312

Via Electronic Filing

Re: 1:24-cv-00063-AT
TRUSTEES OF THE NEW YORK CITY DISTRICT COUNCIL OF CARPENTERS PENSION FUND,
v. MARK FURER et al

Dear Judge Torres:

This firm represents Mark Furer, having recently noticed our appearance in lieu of the Epstein, Becker & Green firm. This letter motion is to request a 30 day extension of time for my client to file his answer and for the parties to submit a joint status letter, which is currently due on December 26, 2024. As the Court is aware, the action has proceeded slowly due to the bankruptcy of co-defendant, Mr. Benjamin. I recently was retained and have been awaiting receipt of the file from my predecessor in the action and documents from my client. With the holiday season upon us, I have not yet received very much and will not be able to fully familiarize myself with the matter in time to contribute to the joint status letter (which Ms. Grancio has prepared for review and comment). My adversary has graciously consented to this application. As such, if the Court is to grant this application, the Answer and status letter would be due on January 27, 2025, as 30 days would fall on a Saturday.

Very truly yours,

Avram E. Frisch

Cc: Adriana Grancio, Esq.

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